

11 WEST 42ND STREET, SUITE 900  
NEW YORK, NY 10036  
(212) 354-0025  
FAX: (212) 869-0067

# TISDALE LAW OFFICES, LLC

10 SPRUCE STREET  
SOUTHPORT, CT 06890  
(203) 254-8474  
FAX: (203) 254-1641

TL@TISDALE-LAW.COM

USDS SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 7/14/08

## MEMO ENDORSED

July 14, 2008

*Put on  
signature*

Via Facsimile (212) 805-6326

Hon. Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 640  
New York, NY 10007

*Colleen McMahon*  
7/14/08

Re: **Saga Forest Carriers Int'l A.S. v. Cosco International Air and Sea Freight,  
Union Global Limited and Letop Forwarding Inc.**  
Docket Number: 07 Civ. 10276  
Our Reference Number: 07-15-1775

Honorable Madam:

We are attorneys for the Plaintiff in this admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. On November 15, 2007 an ex parte Order authorizing process of maritime attachment was issued permitting restraint of Defendant's property in the hands of garnishee banks located within the Southern District of New York. The Defendant has not appeared.

The Plaintiff is proceeding to arbitration and while we are not yet fully secured, we continue to capture funds. To date, we have restrained a total of \$79,848.60 of the Defendants' funds. Therefore, we request an adjournment, or stay of the proceedings, with the right to continue service until the Plaintiff is fully secured, while arbitration is under way.

Should your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court. We thank your Honor for your indulgence in this request.

Respectfully submitted,

*Claunisse Campanale-Orozco*  
Claunisse Campanale-Orozco

dk